

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

IN RE YASMIN AND YAZ) 3:09-md-02100-DRH-CJP
(DROSPIRENONE) MARKETING, SALES)
PRACTICES AND PRODUCTS LIABILITY) MDL No. 2100
LITIGATION)
)

This Document Relates to:

ALL CASES

**BAYER DEFENDANTS' RESPONSE TO MOTIONS REGARDING
INITIAL STATUS CONFERENCE AND PLAINTIFFS' LEADERSHIP**

Defendants Bayer Corporation; Bayer HealthCare Pharmaceuticals Inc. (formerly known as Berlex, Inc., which was formerly known as Berlex Laboratories, Inc.), on its own behalf and as successor by merger to Bayer Pharmaceuticals Corporation; and Bayer HealthCare LLC (“Bayer”) submit this response to motions regarding the initial status conference and plaintiffs’ leadership.

Bayer agrees with plaintiffs that early organization is vital to a successful MDL. To that end, Bayer respectfully requests that this Court schedule a status conference at the Court’s first convenience. To assist the Court, Bayer has submitted a proposed order setting an initial conference. *See generally* Section 40.1 of the Federal Judicial Center’s *Manual for Complex Litigation, Fourth*. The proposed order has been submitted to the Court in electronic form pursuant to Local Rules.

Bayer takes no position with respect to appointment of Interim Liaison Counsel. Among other things, the draft proposed order addresses applications for lead and liaison counsel appointments. Bayer stands ready to work with whatever plaintiffs’ leadership this Court selects.

Respectfully submitted,

s/ Terry Lueckenhoff

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CERTIFICATE OF SERVICE

I hereby certify that on October 15 2009, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system and served the following attorneys of record via U.S. Mail and Electronic Mail:

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